St. Louis County (HW)
Continental Manufacturing

RESOURCE CONSERVATION AND RECOVERY ACT
AND
MISSOURI HAZARDOUS WASTE MANAGEMENT LAW
COMPLIANCE EVALUATION INSPECTION REPORT

Facility

Continental Manufacturing
105 Byassee Drive
Hazelwood, MO 63042
(314) 731-0302

EPA ID# MOD095497137
Mo. Generation ID#: 004953

Participants

Department of Natural Resources
(MDNR)

Charles Heinzman
Environmental Specialist
St. Louis Regional Office

Continental Manufacturing

Mr. Robert Weyermann
Plating Supervisor

Introduction

An inspection of Continental Manufacturing located at the above address was conducted on February 3, 1993. The inspection was conducted under the authority of the Resource Conservation and Recovery Act (RCRA) of 1976 and Sections 260.375(9) and 260.377 of the Missouri Hazardous Waste Management Law (1977) as amended. The inspection was confined to facets of the operation relevant to hazardous waste management.

Facility Description

The facility is an electroplater of janitorial products, mainly mop wringers. The process is zinc plating on carbon steel, and since no cyanides are used it is exempt from the F006 classification by definition. An inspection of the facility on October 18, 1990, by MDNR determined that the facility was exempt from the regulations since the waste stream was non-hazardous.

The facility also has a silk screen operation for painting labels on plastic bottles and trash cans. Paints, inks, (xylene, acetone and pineoil used as thinners) are used in this operation. Mr. Weyermann stated that no hazardous waste is generated from this operation; the paints, inks and thinners are used up in the process.

Mr. Wyermann stated that waste oil is generated at the site from forklift maintenance operations. Mr. Charles Benthal who handles the waste oil was not on site on the day of the inspection. Mr. Benthal was called on February 8, 1993. Mr. Benthal stated that Continental Manufacturing generates approximately 200 to 300 gallons of waste oil (Chevron AW68 hydraulic oil) per month. Mr. Benthal stated that Continental has a contract with Kiesel Company for the removal of the waste oil.

Recommendation

Continue to monitor your waste streams to determine if you are generating any hazardous waste.

Register as a Generator of Waste Oil since your EPA I.D. No. is inactive.

Prepared By:

Charles Heinzman
Environmental Specialist II
St. Louis Regional Office

CH:mc

MISSOURI DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE PROGRAM
SMALL QUANTITY GENERATOR
INSPECTION RECORD AND CHECKLIST

S
SQG-INSP.

ONLY FOR FACILITIES THAT GENERATE/ACCUMULATE < 1000 Kg (2,200 lbs. or approximately, 5 drums)

NAME	DATE	EPA I.D. NUMBER
Continental Manufacturing	February 3, 1993	MOD095497137
ADDRESS	**RR NO.**	**MO I.D. NUMBER**
105 Byassee Drive	N/A	004953
CITY / **NUMBER OF EMPLOYEES**	**YEARS AT SITE**	**TELEPHONE NUMBER**
Hazelwood / 82	15	(314) 731-0302

FACILITY REPRESENTATIVE(S), TITLE(S)
Robert Weyermann, Plating Supervisor

DESCRIPTION OF THE FACILITY'S OPERATIONS AND PLANT

The facility is an electro plater of janitorial products, mainly mop wringers. The plating process uses caustics to remove oil + dirt from steel; the steel is then rinsed with water and neutralized with muriatic acid. The plating bath uses water, zinc bars, liquid zinc and hydrochloric acid. After plating the steel is rinsed again and treated in a chromate tank to form a waterseal. Finally the steel is rinsed in cold + hot water. Periodically the bath solutions are pumped to a 3600 gallon plastic tank and then to a water treatment system where ferrous sulfate + polymer are used to settle out heavy metals. A sludge cake is produced which is handled as a special waste, and the water is discharged into MSD sanitary sewer.

The facility has a silk screen operation for painting labels on plastic containers.

WASTE STREAMS

DESCRIBE EACH WASTE STREAM GENERATED INCLUDING THE PRODUCTION PROCESS	GENERATION RATE	EPA ID NUMBER	DISPOSITION
1. Forklift maintenance operation generates waste hydraulic oil (Chevron AW 68).	200-300 gallons/Month	D098	Kiesel Co.
2.			
3.			
4.			
5.			

CHECK ALL THAT APPLY (Specify if possible)

- ☐ NPDES Permit
- ☐ Septic Tank
- ☐ Air Permit
- ☐ Lead/Acid Batteries
- ☐ H.W. Burner/Blender/Marketer
- ☐ Precious Metal Reclamation
- ☐ POTW _____
- ☐ Solid Waste Landfill _____
- ☐ Waste Water Pretreatment

A. GENERAL

1. ☑ **Registered as a HW Generator** - Section 260.380.1 (1) RSMo and 10 CSR 25-5.262 (2)(A)	GGR	COMMENTS
2. ☑ **Facility determines if waste is hazardous** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.11	GGR	
3. ☑ **Utilizes a licensed hazardous waste transporter** - Section 260.380.1 (5) RSMo	GGR	
4. ☒ **Utilizes authorized HW TSD or RR facility** - Section 260.380.1(7) RSMo	GGR	N/A
5. ☐ **Facility does not operate as a TSD** - Section 260.390(1) RSMo	GGR	

PART 1: WALK-THROUGH INSPECTION

B. PRETRANSPORT, CONTAINERIZATION & STORAGE

1. ☒ **Storage does not exceed 180 days (270 days if transported > 200 miles)** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(e)	GSQ	N/A COMMENTS
2. ☒ **Containers in good condition** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.171	GPT	
3. ☒ **Waste compatible with container** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.172	GPT	
4. ☒ **Containers closed in storage** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.173(a)	GPT	
5. ☒ **Containers storing incompatible waste separated or protected from each other by a dike, berm or wall** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.177(c)	GPT	
6. ☐ **Containers of ignitable or reactive waste stored > 50 ft. from property line (or meet requirements)** - 10 CSR 25-5.262 (2)(C)5. referencing 40 CFR 265.176 as amended by 10 CSR 25-7.265 (2)(I)3.	GOR	
7. ☐ **Waste packaged/labeled/marked per DOT during entire on-site storage period** - 10 CSR 25-5.262 (2)(C)1.	GOR	
8. ☐ **Date of accumulation marked on containers** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(2)	GPT	
9. ☐ **Containers protected from contact with accumulated liquids** - 10 CSR 25-5.262(2)(C)2.B.(II)	GOR	
10. ☐ **Containers clearly marked "hazardous waste"** - 10 CSR 25-5.262(I) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(3)	GPT	
11. ☐ **Facility inspected and maintained (weekly)** - 10 CSR 25-5.262(2)(C)2.A.(II)	GPT	
12. ☐ **Daily inspection of areas subject to spills, ie. waste handling areas** - 10 CSR 25-5.262(2)(C)2.A.(II)	GOR	
13. ☐ **Adequate aisle space is available** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.35	GPT	
14. ☐ **Placards available for transporter** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.33	GPT	
15. ☐ **"No Smoking" signs conspicuously placed by ignitable or reactive wastes** - 10 CSR 25-5.262(2)(C)2.D.(II)	GOR	
16. ☐ **Waste oil containers in good condition, labeled and closed** - 10 CSR 25-11.010(3)(C)	GOR	

C. SATELLITE ACCUMULATION

1. ☒ **Containers kept closed** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.173	GPT	N/A COMMENTS
2. ☒ **Containers in good condition** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.171	GPT	
3. ☒ **Waste compatible with container** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.172	GPT	
4. ☒ **Quantities accumulated not exceeding 55 gal. (1 quart of acutely-hazardous wastes)** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)	GPT	
5. ☒ **Satellite containers go to storage within 3 days of filling** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)3.	GPT	
6. ☐ **Container marked identifying contents & beginning date** - 10 CSR 25-5.262(2)(C)3.	GOR	

7. ☐ **Stored in satellite areas less than 1 year** - 10 CSR 25-5.262(2)(C)3.	GOR	**COMMENTS**

D. PREPAREDNESS AND PREVENTION AND EMERGENCY PROCEDURES

1. ☒ **Facility operated and maintained to minimize the possibility of an emergency** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.31	GPT	**COMMENTS** N/A
2. ☐ **Adequate and proper spill control, decontamination and safety equipment available (fire blankets, respirators, SCBA, absorbents, etc.) and properly tested and maintained** - 10 CSR 25-5.262 (1) incorporating 40 CFR 262.34 (d)(4) referencing 40 CFR 265 Subpart C.	GPT	
3. ☐ **Adequate water supply and fire control equipment** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.32(d)	GPT	
4. ☐ **Communication and emergency equipment tested and maintained** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.33	GPT	
5. ☐ **Emergency coordinator's name and phone number posted near phone** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)	GSQ	
6. ☐ **Telephone number of fire department posted near phone** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)	GSQ	
7. ☐ **Location of fire extinguisher and spill control equipment posted near phone** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)	GSQ	
8. ☐ **Employees familiar with waste handling and emergency procedures** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(iii)	GSQ	
9. ☐ **Device in the hazardous waste operation area capable of summoning emergency assistance** - 10 CSR 25-5.262 (1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.34(a)	GPT	
10. ☐ **Telephone or two-way radio onsite and capable of summoning local fire or police dept.** - 10 CSR 25-5.262 (1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.32(b)	GPT	

E. SQG TANKS

TANK DESIGNATION	CONTENTS	CAPACITY	CONTAINMENT	AGE
1. N/A				
2.				
3.				

1. ☒ **Uncovered tanks have 2 ft. freeboard or containment system** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(b)(3)	GPT	**COMMENTS**
2. ☒ **Continuously fed tanks equipped with a feed cut-off system or a proper by-pass system** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(b)(4)	GPT	
3. ☒ **Waste and/or treatment method is compatible with tank** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(b)(2)	GPT	
4. ☒ **Incompatible wastes not placed in same tank** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(f)	GPT	
5. ☒ **Ignitable or reactive wastes rendered safe/protected from sources of ignition or reaction** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(e)(1)	GPT	
6. ☒ **Ignitable or reactive wastes in covered tanks treated/stored in accordance with NFPA's buffer zone requirements** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(e)(2)	GPT	
7. ☒ **Volatiles with vapor pressure > 78 mm Hg @ 25° C not placed in open tanks** - 10 CSR 25-5.262(2)(C)2.D.(I)	GOR	
8. ☒ **Wastes and residues removed from tank and equipment, and handled properly upon closure** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(d)	GPT	
9. ☐ **Tanks are clearly labeled or marked "Hazardous Waste"** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(3).	GPT	

		COMMENTS
10. ☐ **Inspection of waste feed cut off, bypass system, monitoring data and freeboard each operating day** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(c)	GPT	
11. ☐ **Weekly inspection of confinement structure, construction materials and general area for leaks, corrosion or discharges** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(c)5.	GPT	
12. ☐ **Waste oil tanks in good condition, labeled and closed** - 10 CSR 25-11.010(3)(C)	GOR	

PART 2: RECORDS INSPECTION

F. MANIFESTS

		COMMENTS
1. ☒ **Facility uses manifest system or wastes reclaimed under contractual agreement** - 260.380.1(6) RSMo, and 10 CSR 25-5.262(2)(B)	GMR	N/A
2. ☐ **Generator maintains a copy of the contractual agreement on-site** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.20(e)(2)	GMR	
3. ☐ **Records maintained for a 3-year period** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.40(a)	GRR	
4. ☐ **Generator's MO & EPA I.D. Numbers** - 10 CSR 25-5.262(2)(B)	GOR	
5. ☐ **Manifest document, ID and consecutive shipment numbers** - 10 CSR 25-5.262(2)(B)2.A	GOR	
6. ☐ **Generator's name, address and phone number** - 10 CSR 25-5.262(2)(B)1.	GMR	
7. ☐ **All transporters' names, phone numbers, license plate #s, MO & EPA I.D.#'s** - 10 CSR 25-5.262(2)(B)2.	GMR	
8. ☐ **Designated facility name, address, phone, MO & EPA I.D. #,** - 10 CSR 25-5.262(2)(B)1.	GMR	
9. ☐ **DOT shipping name, Hazard Class and waste I.D. # (RQ - if required)** - 10 CSR 25-5.262(2)(B)2.	GMR	
10. ☐ **Containers, quantity and specific gravity designated** - 10 CSR 25-5.262(2)(B)2.	GMR	
11. ☐ **Manifest signed and dated** - 10 CSR 25-5.262(2)(B)1.	GMR	
12. ☐ **Out of state manifests have all required MO information** - 10 CSR 25-5.262(2)(B)4.A	GOR	
13. ☐ **Manifest continuation sheets are not used** - 10 CSR 25-5.262(2)(B)1	GOR	
14. ☐ **Manifest returned within 35 days - or exception report submitted within 45 days** - 10 CSR 25-5.262(2)(D)2.C	GRR	
15. ☐ **Summary Manifest Reports and manifest copies sent to DNR quarterly** - 10 CSR 25-5.262(2)(D)1	GOR	
16. ☐ **Tests waste or uses knowledge of waste to determine if the waste is restricted from land disposal** - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB	
17. ☐ **"Land-Ban" notification/certification sent with manifests or with 1st shipment under a tolling agreement & retained on-site for 5 years** - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB	
18. ☐ **Notification/certification includes correct EPA Hazardous Waste number, corresponding treatment standards, manifest number, and waste analysis data** - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB	

G. PREPAREDNESS AND PREVENTION

		COMMENTS
1. ☐ **Arrangements with local emergency agencies** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.37	GPT	N/A
2. ☐ **Emergency coordinator(s) on premise or on call** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(i)	GSQ	

H. WASTE OIL

		COMMENTS
1. ☑ **Waste oil is managed properly and not disposed of into the environment** - 10 CSR 25-11.010(1)(D)	GOR	
2. ☒ **Listed hazardous waste mixed with waste oil is handled as a hazardous waste** - 10 CSR 25-11.010(1)(C)2. N/A	GOR	
3. ☐ **Registered as waste oil generator if gen./accum. 220 lb.** - 10 CSR 25-11.010(2)(A)	GOR	
4. ☑ **Written waste oil contract maintained** - 10 CSR 25-11.010(4)(C)	GOR	Charles Benthal, maintenance
5. ☑ **Uses a licensed transporter and receiving facility** - 10 CSR 25-11.010(4)	GOR	

I. RESOURCE RECOVERY

		COMMENTS
1. ☒ **RR certification for energy recovery or reclamation of waste oil or hazardous waste on-site** - 10 CSR 25-9.020(1)(A)3.	GOR	N/A
2. ☐ **Still bottoms of RR residues disposed of properly** - Section 260.380.1(5), RSMo	GOR	
3. ☐ **Facility is classified as U, R1, or R2 accurately** - 10 CSR 25-9.020(3)(A).	GOR	
4. ☐ **Facility meets the operating conditions of certification** - 10 CSR 25-9.020(3).	GOR	
5. ☐ **Facility has submitted a written request and received approval from the DNR for all changes in operation including closure** - 10 CSR 25-9.020(3)(E)1 and 2.	GOR	
6. ☐ **Facility report submitted to DNR quarterly** - 10 CSR 25-9.020(3)(E)6. referencing 10 CSR 25-7.264(2)(E)3.	GOR	
7. ☐ **Facility maintains a complete written operating record** - 10 CSR 25-9.020(3)(E)5. referencing 40 CFR 264.73(b)(1) and (2) as modified by 10 CSR 25-7.264(2)(E)2.	GOR	
8. ☐ **Facility has notified EPA and the state that it qualifies for a small quantity on-site burner exemption or has interim status or a permit if it burns hazardous waste on-site** - 10 CSR 25-7.266(1) incorporating 40 CFR 266.108 and 40 CFR 266.103.	GOR	

CHECKLIST KEY

Check the ☑ if in compliance.

Circle the ⓘ if not in compliance and provide comment.

N/A = Not Applicable

A shaded item is a serious deviation from the requirements (Class I violation)

An unshaded item is a significant deviation from the requirements (Class II violation unless conditions warrant Class I)

COMMENTS: INCLUDE DISCUSSION OF FACILITY'S WASTE MINIMIZATION PLAN

INSPECTOR'S SIGNATURE	DATE
Charles T. Jennings	2/3/93

St. Louis County (HW)
Continental Manufacturing

MEL CARNAHAN
Governor

DAVID A. SHORR
Director

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL QUALITY
St. Louis Regional Office
10805 Sunset Office Drive, Suite 100 St. Louis, MO 63127-1017 314-822-0101

March 1, 1993

Mr. Charles Wekenborg
Production Manager
Continental Manufacturing
105 Byassee Drive
Hazelwood, MO 63042

Dear Mr. Wekenborg:

Enclosed please find a report of an inspection conducted on February 3, 1993, by Mr. Charles Heinzman of my staff.

After a records review and site tour, the inspector determined that your current inactive status as a hazardous waste generator is correct. Should your waste streams, other than waste oil, change in the future, you will need to make a new determination concerning your status.

Because your EPA I.D. No. is inactive, you will need to register as a waste oil generator and maintain a waste oil contract on site. A generator of waste oil registration form and a copy of the Missouri Hazardous Waste Regulations concerning waste oil are enclosed. Mail the registration form to the Missouri Department of Natural Resources, Hazardous Waste Management Program, P.O. Box 176, Jefferson City, MO 65102 and a copy to the St. Louis Regional Office by April 1, 1993.

Should you have any questions, or wish to confer in this matter, please contact me.

Sincerely,

ST. LOUIS REGIONAL OFFICE

Robert S.P. Eck
Regional Director

RSPE:CH:mc

Enclosures

c: HWP

RECEIVED
MAR 3 1993
HAZARDOUS WASTE PROGRAM
MISSOURI DEPARTMENT OF
NATURAL RESOURCES